



November 17, 2005

Filed electronically

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, NW
Washington, DC 20554

Re: Texas RSA 8 West Limited Partnership
and Lynn County Cellular Limited Partnership
Hearing Aid Compatibility Report
WT Docket No. 01-309

Dear Ms. Dortch:

Pursuant to the Commission's *Report and Order*, WT Docket No. 01-309 (rel. Aug. 14, 2003) ("Order") and its subsequent Public Notice (DA 04-630, rel. Mar. 8, 2004), Texas RSA 8 West Limited Partnership and Lynn County Cellular Limited Partnership ("Operators"), by their common general partner, Poka Lambro Telephone Cooperative, Inc., submit the following report in the form prescribed by the Commission. Each Operator is a Tier III carrier serving portions of rural Texas. As carriers, the Operators have limited access to information responsive to many of the questions posed by the Order, and rely on handset vendors to provide updated information regarding hearing aid compatibility.

(1) Digital Wireless Phones Tested

N/A

(2) Laboratory Used

N/A

(3) Test Results for Each Phone Tested

N/A

(4) Identification of Compliant Phone Models and Ratings According to ANSI C63.19

Pursuant to the *Memorandum Opinion and Order* issued In the Matter of Section 68.4(a) of the Commission's Rules Governing Hearing Aid Compatible Telephones; Cingular Wireless LLC Petition for Waiver of Section 20.19(c)(3)(i)(A) of the Commission's Rules, WT Docket No. 01-309, FCC 05-166 (rel. Sept. 8, 2005) ("*MO&O*"), the Operators, utilizing GSM technology, hereby notify the Commission that they are availing themselves of the Commission's decision to accept temporarily the HAC rating for the 1900 MHz mode in dual-mode GSM handsets also utilizing 850 MHz frequencies as overall compliance for such dual mode phones. Under that specification, therefore, the Operators report that, as required by Section 20.19(c)(2) of the Commission's Rules, the Operators have available for sale in each retail outlet the following three handset models certified by their respective manufacturers as compliant with the standards established by Section 20.19(b)(1) of the Commission's Rules:

Motorola V3
Motorola V220
Nokia 6102

Each model is available to consumers for in-store testing. Operators also report that, pursuant to the *MO&O*, they have each adopted a 30-day return policy, which allows for a full refund of price of a dual-mode (1900-MHz HAC-complaint only) phone purchased by or for a hearing-impaired person if the user is dissatisfied with the phone. Notification of this policy is provided to prospective customers by our trained sales representatives, and accompanied by written confirmation upon purchase of the specified phone.

(5) Report on the Status of Product Labeling

There being no compliant handsets, the Operators have not yet undertaken labeling efforts. The Operators are informed that one of its vendors, Motorola, has been active on the Alliance for Telecommunications Industry Solutions ("ATIS") Incubator for Hearing Aid Compatibility. Motorola reports that it has participated in Incubator Work Group #6 – Labeling, which is comprised of wireless manufacturers, carriers and hearing-impaired user representatives. The Work Group is tasked with creating a standard format for HAC labeling.

(6) Report on Outreach Efforts

Operators have developed a hearing aid compatibility information sheet designed to educate customers in their selection of handsets. This information is available in each retail outlet. Sales staff has been trained to demonstrate the operation of HAC-compliant handsets and are able to direct customers to additional sources of information. In addition, related information is available on Operators' websites.

(7) Information Related to Retail Availability of Compliant Phones

As small carriers, Operators rely on wholesale distributors who, in turn, are dependent on manufacturers. Generally, smaller carriers are disadvantaged in terms of immediate access to newer model handsets. Operators continue to review the retail marketability of compliant phones available to it on a retail basis.

(8) Information Related to Incorporating Hearing Aid Compatibility Features into Newer Models of Digital Wireless Phones

Motorola reports that every Motorola phone shipped in the United States comes with a telecoil in the speaker for the specific purpose of coupling with hearing aid telecoils. Motorola reports that it also offers a variety of models with different form factors, including clam-shell style phones. Motorola reports that its current models work well with hearing aids, especially those hearing aids with adequate immunity to electromagnetic interference.

(9) Any Activities Related to ANSI C63.19 or Other Standards Work Intended to Promote Compliance with the Order

Operators are informed that one of its vendors, Motorola, was a charter author of the ANSI C63.19 document and that Motorola has offered more than 40 comments to revise this standard.

(10) Total Numbers of Compliant and Non-compliant Phone Models Offered as of the Time of the Report

3 compliant handsets and 10 non-compliant handsets

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(11) Ongoing Efforts for Interoperability Testing with Hearing Aid Devices

The Operators have no ongoing efforts for interoperability testing with hearing aid devices.

Respectfully submitted,

POKA LAMBRO TELECOMMUNICATIONS, LTD.
General Partner of
Texas RSA 8 West Limited Partnership
and Lynn County Cellular Limited Partnership

By



Dave Hageman

Vice President Wireless Operations